



STATE OF MISSISSIPPI
DEPARTMENT OF AGRICULTURE AND COMMERCE
CINDY HYDE-SMITH
COMMISSIONER

December 15, 2017

Tawanda Maignan
Emergency Response Team Leader
Risk Integration, Minor Use, and Emergency Response Branch
Registration Division I
U.S. EPA Office of Pesticide Programs

Dear Ms. Maignan:

The Mississippi Department of Agriculture and Commerce hereby submits a recertification request for the specific exemption granted for the use of sulfoxaflor (Transform® WG Insecticide) to control tarnished plant bug in cotton crops in Mississippi. According to the authorization letter for 17MS01, this exemption is eligible for streamlined review, as the emergency condition still exists.

Also, I would certify that the information in our previous submission is still accurate. The only change would be to please replace Don Christy as a contact person with myself, Michael Ledlow. The phone number to reach me remains unchanged, and my email is MichaelL1@mdac.ms.gov. The requested chemical sulfoxaflor will be used in identical manner as was previously requested and granted, including rate and method. There have been no new effective control measures for this pest introduced since the previous request.

If you should have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Michael Ledlow".

Michael Ledlow
Director



Department of Entomology and Plant Pathology

December 20, 2017

To whom it may concern:

The purpose of this letter is to request an emergency exemption (Section 18) for the use of sulfoxaflor (Transform WGTM, Dow AgroSciences) to manage tarnished plant bug, *Lygus lineolaris*, in cotton. Cotton producers throughout Mississippi have successfully used sulfoxaflor since 2012 to manage tarnished plant bugs. Since its introduction, Transform has reduced overall tarnished plant bug applications, and provided significant yield increases and returns in gross revenues. Over the last five years, sulfoxaflor has replaced more toxic insecticides including pyrethroids, organophosphates, and neonicotinoids. Because of its high level of efficacy, relative safety to beneficial arthropods and pollinators, and protection of cotton yields, Transform has become the foundation of the insecticide component of Mississippi's overall IPM program. Since the initial Section 3 registration in 2013, Transform has been used on more than three million acres across the mid-south region with zero reported incidents of adverse effects on bees or other pollinators. Despite the higher cost of Transform relative to other products used for tarnished plant bug control, cotton growers and consultants have incorporated Transform into their overall insect management programs. This demonstrates their commitment to selecting safe alternatives to more toxic insecticides as long as they do not sacrifice yields.

Cotton growers, beekeepers, and other stakeholders in the state of Mississippi demonstrated their commitment to the protection of managed honey bees with their adoption of the Mississippi Honey Bee Stewardship Program. Since the introduction of this program, the level of cooperation and communication between beekeepers and farmers has been unprecedented. In particular, the vast majority of growers in Mississippi have bought into this program and view beekeepers as fellow farmers. As a result, they have shown real concern about the livelihood of beekeepers they host on their farms.

Transform provides a high level of efficacy and yield protection from tarnished plant bug and cotton aphid, preserves beneficial insect populations, and more importantly replaces more toxic insecticides. Because of these attributes, Transform rapidly became the foundation of our cotton integrated pest management program for tarnished plant bug.



Department of Entomology and Plant Pathology

Mississippi received Transform in 2017 for use against tarnished plant bugs through a Section 18 emergency exemption and the product was used successfully with no adverse effects to the environment or local beekeepers. This indicates that farmers have demonstrated that this product can be used in accordance to labeled directions to manage tarnished plant bugs in a sustainable manner.

We certify that the conditions set forth in 2017 will remain consistent with expectations for the 2018 growing season and are identical in nature. We are not aware of new or alternative management strategies that are different than in the preceding year. We respectfully ask that EPA consider granting the exemption of Transform for the use year of 2018 described in the same manner as the previous submission for use in 2017.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Angus Catchot". The signature is written in a cursive, flowing style.

Angus Catchot, Extension Entomologist-MSU-ES



Dow AgroSciences

Dow AgroSciences LLC

9330 Zionsville Road
Indianapolis, IN 46163

dowagro.com

December 4, 2017

Jasper Cobb
Mississippi Department of Agriculture and Commerce
Bureau of Plant Industry
P.O. Box 5207
Mississippi State, MS 39762

Re: Support letter for Transform™ WG Section 18 on cotton

Dear Mr. Cobb,

Per your request, this letter is to confirm that Dow AgroSciences supports the pursuit of a Section 18 emergency exemption for Transform WG to control plant bugs on cotton in the state of Mississippi. Transform WG has provided excellent efficacy against plant bugs in previous use under both Section 18 exemptions and Section 3 registration, with no negative impacts on non-target insects. It represents a new class of chemistry with a novel mode of action, and controls pests resistant to other classes of chemistry. Although Section 3 registration was recently reestablished for Transform, cotton is not on the label at this time.

If you have questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Thomas".

Jamey Thomas, Ph.D.
US Regulatory Manager
Dow AgroSciences

cc: Tami Jones-Jefferson, DAS

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Transform[®] WG

Registration Notes:

Proposed Section 18.

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Dow AgroSciences

Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Transform[®] WG

For Control of Lygus Bugs in Cotton

Section 18 Emergency Exemption

File symbol: XXXXXX

FOR DISTRIBUTION AND USE ONLY IN MISSISSIPPI UNDER SECTION 18 EMERGENCY EXEMPTION

This Section 18 Emergency Exemption is effective XXXXXX and expires XXXXXX.

- This labeling must be in the possession of the user at the time of application.
- It is in violation of federal law to use this product in a manner inconsistent with its labeling.
- Read the label affixed to the container for Transform[®] WG insecticide before applying. Carefully follow all precautionary statements and applicable use directions.
- Any adverse effects resulting from the use of Transform WG under this emergency exemption must be immediately reported to the Mississippi Department of Agriculture

Directions for Use

Pests and Application Rates:

Pests	Transform WG (oz/acre)
tarnished plant bug	1.5 – 2.25 (0.047 – 0.071 lb ai/acre)

Advisory Pollinator Statement: Notifying known beekeepers within 1 mile of the treatment area 48 hours before the product is applied will allow them to take additional steps to protect bees. If known apiaries are within one mile of cotton fields intended for treatment, applications should be made within three hours of sunset during the flowering period. Prior to use of Transform WG, growers and the beekeepers hosted on their farm are advised to implement cooperative standards outlined in the Mississippi Honeybee Stewardship Program.

Application Timing: Treat in accordance with local economic thresholds. Consult your Dow AgroSciences representative, cooperative extension service, certified crop advisor or state agricultural experiment station for any additional local use recommendations for your area.

Application Rate: Use a higher rate in the rate range for heavy pest populations. Two applications may be required for optimum tarnished plant bug control under high pest pressure or heavy immigration of plant bugs from other crops.

Restrictions:

- **Preharvest Interval:** Do not apply within 14 days of harvest.
- **Minimum Treatment Interval:** Do not make applications less than 5 days apart.
- Do not make more than four applications per acre per year.
- Do not make more than two consecutive applications per crop.
- Do not apply more than a total of 8.5 oz of Transform WG (0.266 lb ai of sulfoxaflor) per acre per year.

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R396-119

Approved: __/__/__

Replaces R396-100